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March 3, 2009

John L. Clark

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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW, Suite CY-B402 Washington, DC 20554

Re: EB Docket 06-36; Annual CPNI Certification

Dear Ms. Dortch:

Submitted herewith is the calendar year 2008 CPNI certification of Telecom Consultants, Inc. (FRN 0009600552) pursuant to 47 C.F.R. § 64.2009(e). Please advise me if there are any questions regarding this submission.

Respectfully submitted,

John L. Clark

Counsel for Telecom Consultants, Inc.

cc: Enforcement Bureau; Best Copy

3223/001/X107405.v1

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64,2009(e) CPNI Certification for calendar year 2008

Date filed: March 3, 2009

Name of company covered by this certification: Telecom Consultants, Inc.

Form 499 Filer ID: [824338]

Name of signatory: John Toepfer

Title of signatory: President

I, John Toepfer, certify that I am an officer of the company named above, that I am authorized to make this certification on its behalf, and that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. (See attached statement.)

The Company has no information that pretexters have attempted to access CPNI maintained by the Company. The steps the Company is taking to protect CPNI are described in the attached statement.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Bv:

Title: President

Dated: March 3, 2009

STATEMENT OF COMPLIANCE PROCEDURES

Telecom Consultants, Inc, (the "Company") has established operating procedures to protect the privacy of Customer Proprietary Network Information ("CPNI") as follows:

- (1) The Company does not allow the use of CPNI for sales or marketing of any category of service to which a customer does not already subscribe, except for the provision of CPE, voice mail, inside wire service, or custom-calling (adjunct-to-basic) services.
- (2) The Company has adopted authentication procedures to protect against unauthorized access to CPNI during customer-initiated telephone contact, online account access, and visits to the Company's business locations at which access to CPNI may be obtained. These procedures require the customer to provide, in the case of visits to the Company's locations, a proper photo i.d., and in other cases, a password that is provided to the customer only after the customer is first authenticated using non-readily-available biographical or account information. Further, whenever a password, response to back-up means of authentication, online account, or address of record is created or changed, the customer is notified of the change in accordance with the FCC's rules safeguarding CPNI. In cases where a business customer has a dedicated Company account representative, other authentication methods may be used as expressly set forth in the contract between the Company and the customer.
- (3) Except as set forth above, the Company discloses CPNI to third parties only pursuant to lawful process. In the event of any uncertainty, the Company's policy is to consult with counsel before responding to any request for CPNI from a third party.
- (4) In the event of any breach in the security of customers' CPNI, the Company will notify law enforcement pursuant to the FCC's rules before notifying customers or publicly disclosing the breach. In addition, the Company will maintain records of all such breaches and notifications as required by the FCC's rules.
- (5) The Company has trained all personnel who have access to CPNI, or control over access to CPNI, regarding the uses for which CPNI may be made, the restrictions in the use of CPNI, and the authentication requirements for disclosure of CPNI to customers, and all personnel have been trained in the notification procedures to be followed in the event of a breach. The Company has a no tolerance policy for violations and will discipline any individual who has been found in violation of CPNI requirements. Intentional or grossly-negligent violations will result in termination. In other cases, discipline, up to and including termination, will apply, as appropriate.

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